

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
BLAINE T. WELSH  
Assistant United States Attorney  
Nevada Bar. No. 4790  
333 Las Vegas Blvd. South, Suite 5000  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Facsimile: (702) 388-6787  
Email: Blaine.Welsh@usdoj.gov

DAVID C. SHONKA  
Acting General Counsel  
NIKHIL SINGHVI  
600 Pennsylvania Avenue, NW  
Mailstop CC-10232  
Washington, D.C. 20580  
Phone: (202) 326-3480  
Facsimile: (202) 326-3197  
Email: nsinghvi@ftc.gov  
*Attorneys for Plaintiff Federal Trade Commission*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG Services, Inc. et al.,

Defendants, and

Park 269, LLC, et al.,

Relief Defendants.

Case No. 2:12-cv-536

**PLAINTIFF'S MOTION TO  
WITHDRAW ATTORNEYS**

Pursuant to LR IA 11-6(b), Plaintiff Federal Trade Commission (“FTC”) and attorneys Nikhil Singhvi, Jason D. Schall, Helen P. Wong, Ioana Rusu, Courtney A. Estep, and Thomas E. Kane respectfully move the Court for leave to withdraw as attorneys in this case, stating as follows:

1. On September 30, 2016, the Court entered a final judgment in this case. (ECF No. 1057.)

2. On November 7, 2016, the Court approved the FTC’s motion to admit Kimberly L. Nelson as its attorney in this case. (ECF No. 1084.) Ms. Nelson is an attorney in the FTC’s enforcement division, which is responsible for post-judgment order compliance in FTC matters.

3. With the entry of judgment and with Ms. Nelson’s appearance, FTC attorneys Nikhil Singhvi, Jason D. Schall, Helen P. Wong, Ioana Rusu, Courtney A. Estep, and Thomas E. Kane will cease representing the FTC in this case.

4. Notice of the withdrawal of attorneys Singhvi, Schall, Wong, Rusu, Estep, and Kane has been provided to the FTC and, as stated in the certificate of service, to opposing counsel.

5. Because the Court has entered final judgment (ECF No. 1057), and because attorney Nelson is assuming responsibility for any further proceedings in this Court, the withdrawal of attorneys Singhvi, Schall, Wong, Rusu, Estep, and Kane shall not cause any delay of pretrial proceedings, discovery, the trial, or any hearing in this case.

WHEREFORE, the FTC and respectfully move the Court for leave to withdraw Nikhil Singhvi, Jason D. Schall, Helen P. Wong, Ioana Rusu, Courtney A. Estep, and Thomas E. Kane as attorneys in this case.

\\

\\

\\

\\

\\

\\

\\

\\

\\

\\

1 Dated: November 16, 2016

Respectfully submitted,

2 /s/ Nikhil Singhvi  
Nikhil Singhvi

3 /s/ Jason D. Schall  
4 Jason D. Schall

5 /s/ Helen P. Wong  
6 Helen P. Wong

7 /s/ Ioana Rusu  
Ioana Rusu

8 /s/ Courtney A. Estep  
9 Courtney A. Estep

10 /s/ Thomas E. Kane  
11 Thomas E. Kane

12 *Attorneys for Plaintiff Federal Trade Commission*

13  
14 IT IS SO ORDERED:

15 

16  
17 UNITED STATES MAGISTRATE JUDGE

18 November 16, 2016

19 DATED: \_\_\_\_\_  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I, Nikhil Singhvi, certify that, as indicated below, all parties were served by ECF with **PLAINTIFF'S MOTION TO WITHDRAW ATTORNEYS** filed with the Court.

Von S. Heinz (vheinz@lrrc.com)

Darren J. Lemieux (dlemieux@lrrc.com)

E. Leif Reid (lreid@lrrc.com)

Jeffrey D. Morris (jmorris@berkowitzoliver.com)

Nick J. Kurt (nkurt@berkowitzoliver.com)

Justin C. Griffin (justingriffin@quinnemanuel.com)

Sanford I. Weisburst (sandyweisburst@quinnemanuel.com)

Kathleen Sullivan (kathleensullivan@quinnemanuel.com)

*Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC; LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital Partners, LLC; Scott A. Tucker; Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker*

Linda C. McFee (lmcfee@mcdowellrice.com)

Robert Peter Smith (petesmith@mcdowellrice.com)

*Attorneys for Relief Defendants Kim C. Tucker and Park 269 LLC*

Victoria W. Ni (vni@publicjustice.net)

Craig B. Friedberg (attcbf@cox.net)

*Attorneys for Intervenor Americans for Financial Reform*

Jeffrey Vanderloop (jvanderloop@madvanlaw.com)

Martin Welsh (mwelsh@lvlaw.com)

*Attorneys for Interested Third Parties El Dorado Trailer Sales, LLC and ETS Ventures, LLC*

November 16, 2016

/s/ Nikhil Singhvi

Nikhil Singhvi